

## **Exhibit 2**

**UNITED STATES BANKRUPTCY COURT  
NORTHERN DISTRICT OF ILLINOIS**

CHOP FOO, LLC	)	
	)	
Plaintiff,	)	
	)	
v.	)	Bankruptcy Case No. 21-05434
	)	
	)	Adversary No. 21ap00117
JUSTIN FARA,	)	
	)	
Defendant.	)	

**DEFENDANT JUSTIN FARA'S RESPONSES TO PLAINTIFF CHOP FOO LLC'S  
INTERROGATORIES & REQUESTS FOR PRODUCTION**

Defendant JUSTIN FARA, by and through his attorneys, The Gunderson Law Firm, LLC., and in response to Requests for Production submitted by Plaintiff Chop Foo, LLC, pursuant to Rule 33 of the Federal Rules of Civil Procedure and Bankruptcy Rule 7033, responds as follows:

**GENERAL OBJECTIONS**

1. Defendant objects to each instruction, definition, document request, and interrogatory to the extent that it purports to impose any requirement or discovery obligation greater than or different from those under the Federal Rules of Civil Procedure, the Bankruptcy Rules and the applicable Rules and Orders of the Court.
2. Defendant objects to each document request and interrogatory that is overly broad, unduly burdensome, or not reasonably calculated to lead to the discovery of admissible evidence.
3. Defendant objects to each instruction, definition, document request, and interrogatory as overbroad and unduly burdensome to the extent it seeks documents or information that are readily or more accessible to Plaintiff from Plaintiff's own files, from documents or information in Plaintiff's possession, or from documents or information that Defendant previously produced to Plaintiff. Responding to such requests and interrogatory would be oppressive, unduly burdensome, and unnecessarily expensive, and the burden of responding to such requests and interrogatory is substantially the same or less for Plaintiff as for Defendant. This objection encompasses, but is not limited to, documents and answers to interrogatories previously

produced by Defendant to Plaintiff in the course of Plaintiff's State Court case against Defendant, all correspondence between the Plaintiff and Defendant, all other information provided by Defendant to Plaintiff, and all information produced by Plaintiff to Defendant in response to discovery requests of Defendant. All such documents and information will not be produced.

4. Defendant's document requests and interrogatory call for the production of documents and information that were produced to the Plaintiff by other entities and that may contain confidential, proprietary, or trade secret information.

5. Defendant incorporates by reference every general objection set forth above into each specific response set forth below. A specific response may repeat a general objection for emphasis or some other reason. The failure to include any general objection in any specific response does not waive any general objection to that request. Moreover, Defendant does not waive its right to amend its responses.

### **INTERROGATORIES**

#### **INTERROGATORY #1**

Identify the amount, date, and recipient of each expenditure for materials or labor You or BJ Construction made pursuant to the Contract.

**ANSWER:** See the attached "EXHIBIT A."

#### **INTERROGATORY #2**

Identify all individuals responsible for overseeing BJ Construction's work at the Property, and for each individual provide: (1) their name; (2) their current address; (3) the time period in which they oversaw the work at the Property; (4) their responsibilities during that time period; and (5) their compensation.

**ANSWER:** See the attached "EXHIBIT B."

#### **INTERROGATORY #3**

Identify the amount and date of each payment, commission, or other funds You personally received from the money paid by Plaintiff to BJ Construction pursuant to the Contract.

**ANSWER:** No funds were directly received by myself from the project. Funds from the project were deposited into the business account. The business infrequently paid me via payroll or owner draw.

**INTERROGATORY #4**

Identify and describe the source of the \$65,400.00 deposited in PNC Bank Business Checking Account 46-3924-1727, in the name of Klasik Construction Inc., in January 2021.

**ANSWER:** These funds break down as follows:

- i) \$15,000 owner contribution.
- ii) \$20,000 payment toward project at 5650 W. Grace Chicago, IL.
- iii) \$27,500 deposit from Client for project at 680 N Lakeshore Drive Chicago, IL.

**REQUESTS FOR PRODUCTION**

**DOCUMENT REQUEST NO. 1:**

*All documents, including communications, evidencing, relating to, or referring to the Contract and the work performed by BJ Construction at the Property.*

**RESPONSE TO DOCUMENT REQUEST NO. 1:**

Defendant objects to this request as duplicative and burdensome to the extent that it calls for documents already produced to Plaintiff in State Court Litigation. Documents already produced will not be produced again.

**DOCUMENT REQUEST NO. 2:**

*All documents evidencing, relating to, or referring to the finances of BJ Construction from January 1, 2018 through the present.*

**RESPONSE TO DOCUMENT REQUEST NO. 2:**

Defendant objects to this request as duplicative and burdensome to the extent that it calls for documents already produced to Plaintiff in State Court Litigation. Documents already produced will not be produced again.

**DOCUMENT REQUEST NO. 3:**

*All documents evidencing, relating to, or referring to the finances of BJ Construction from January 1, 2018 through the present.*

**RESPONSE TO DOCUMENT REQUEST NO. 3:**

Defendant objects to this request as duplicative and burdensome to the extent that it calls for documents already produced to Plaintiff in State Court Litigation. Documents already produced will not be produced again.

Subject to the above objections, Defendant has no responsive documents in its possession, custody, or control, other than those that have already been produced to Plaintiff and those being produced in deposition testimony in the parties State Court Litigation.

**DOCUMENT REQUEST NO. 4:**

*All documents evidencing, relating to, or referring to any transfers of money or other assets from BJ Construction to You from January 1, 2018 through the present.*

**RESPONSE TO DOCUMENT REQUEST NO. 4:**

Defendant objects to this request as duplicative and burdensome to the extent that it calls for documents already produced to Plaintiff in State Court Litigation. Documents already produced will not be produced again.

Subject to the above objections, Defendant has supplemented his previous document production and has no other documents in his possession, custody, or control, other than those that have already been produced to Plaintiff and those being produced in deposition testimony in the parties State Court Litigation.

**DOCUMENT REQUEST NO. 5:**

*All documents evidencing, relating to, or referring to any transfers of money or other assets from BJ Construction to Amber Pecora Fara from January 1, 2018 through the present.*

**RESPONSE TO DOCUMENT REQUEST NO. 5:**

Defendant objects to this request as duplicative and burdensome to the extent that it calls for documents already produced to Plaintiff in State Court Litigation. Documents already produced will not be produced again.

Subject to the above objections, Defendant has supplemented his previous document production and has no other documents in his possession, custody, or control, other than those that have already been produced to Plaintiff and those being produced in deposition testimony in the parties State Court Litigation.

**DOCUMENT REQUEST NO. 6:**

*All documents evidencing, relating to, or referring to any transfers of money or other assets from BJ Construction to Klasik Construction Inc. from January 1, 2018 through the present.*

**RESPONSE TO DOCUMENT REQUEST NO. 6:**

Defendant objects to this request as duplicative and burdensome to the extent that it calls for documents already produced to Plaintiff in State Court Litigation. Documents already produced will not be produced again.

Subject to the above objections, Defendant has supplemented his previous document production and has no other documents in his possession, custody, or control, other than those that have already been produced to Plaintiff and those being produced in deposition testimony in the parties State Court Litigation.

**DOCUMENT REQUEST NO. 7:**

*All invoices received by BJ Construction from anyone who performed work or provided materials for the work contemplated by the Contract.*

**RESPONSE TO DOCUMENT REQUEST NO. 7:**

Defendant objects to this request as duplicative and burdensome to the extent that it calls for documents already produced to Plaintiff in State Court Litigation. Documents already produced will not be produced again.

Subject to the above objections, Defendant has supplemented his previous document production and has no other documents in his possession, custody, or control, other than those that have already been produced to Plaintiff and those being produced in deposition testimony in the parties State Court Litigation.

**DOCUMENT REQUEST NO. 8:**

*All accounts receivable records of BJ Construction from January 1, 2018 to the present.*

**RESPONSE TO DOCUMENT REQUEST NO. 8:**

Defendant objects to this request as duplicative and burdensome to the extent that it calls for documents already produced to Plaintiff in State Court Litigation. Documents already produced will not be produced again.

Subject to the above objections, Defendant has supplemented his previous document production and has no other documents in his possession, custody, or control, other than those that have already been produced to Plaintiff and those being produced in deposition testimony in the parties State Court Litigation.

**DOCUMENT REQUEST NO. 9:**

*All payroll records of BJ Construction, its officers or employees, from January 1, 2018 to the present.*

**RESPONSE TO DOCUMENT REQUEST NO. 9:**

Defendant objects to this request as duplicative and burdensome to the extent that it calls for documents already produced to Plaintiff in State Court Litigation. Documents already produced will not be produced again.

Subject to the above objections, Defendant has supplemented his previous document production and has no other documents in his possession, custody, or control, other than those that have

already been produced to Plaintiff and those being produced in deposition testimony in the parties State Court Litigation.

**DOCUMENT REQUEST NO. 10:**

*All documents evidencing, relating to, or referring to the finances of BJ Construction from January 1, 2018 through the present.*

**RESPONSE TO DOCUMENT REQUEST NO. 10:**

Plaintiff further objects to this request as duplicative, overbroad, and burdensome even if the term "source of revenue" were construed more narrowly to include only Plaintiffs business that was the subject of the underlying dispute. Even so construed, the request is duplicative, overbroad, and burdensome to the extent that it calls for documents already produced to Defendant. Documents already produced will not be produced again.

Subject to and without waiver of the foregoing objections, Plaintiff will produce the documents responsive to this request that have not already been produced.

**JUSTIN FARA**

By: /s/ Michael Jeffrey Gunderson  
The Gunderson Law Firm, LLC  
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Chicago, Illinois 60618  
(312) 600-5000 (PH)  
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**EXHIBIT A**

**Payments (exported on Mon, Mar 8, 2022)**

Job	Bill/PO Title	Pay To	Payment Amount	Invoice Date	Status	Date Paid	Paid By
1560 N. Damen	Scaffolding	Ignacio Abad	\$8,460.00	7/13/2019	Paid	1/28/2020	Justin Fara
1560 N. Damen	Roofing Materials	Menards	\$233.22	10/7/2019	Paid	10/7/2019	Justin Fara
1560 N. Damen	Roofing Material	Discount Roofing Material	\$1,142.57	10/2/2019	Paid	10/2/2019	Dion Hickles
1560 N. Damen	Waste/Garbage Removal	Platinum Hands Contracto	\$1,337.50	7/30/2019	Paid	8/9/2019	Masha Spivak
1560 N. Damen	Waste/Garbage Removal	Platinum Hands Contracto	\$1,337.50	7/3/2019	Paid	7/18/2019	Masha Spivak
1560 N. Damen	Roofing Material	Discount Roofing Material	\$138.52	7/2/2019	Paid	7/3/2019	Justin Fara
1560 N. Damen	Roofing Material	Menards	\$9.24	7/2/2019	Paid	7/3/2019	Justin Fara
1560 N. Damen	Hardwood Flooring	Mike's Hardwood Flooring	\$7,000.00	7/2/2019	Paid	7/2/2019	Masha Spivak
1560 N. Damen	Framing	Menards	\$250.75	7/1/2019	Paid	7/1/2019	Justin Fara
1560 N. Damen	Roofing	Ignacio Abad	\$4,300.00	6/20/2019	Paid	6/28/2019	Justin Fara
1560 N. Damen	Roofing	Ignacio Abad	\$2,500.00	6/17/2019	Paid	6/17/2019	Dion Hickles
1560 N. Damen	Framing	Home Depot	\$72.40	6/12/2019	Paid	6/13/2019	Masha Spivak
1560 N. Damen	Lumber	Home Depot	\$67.09	6/10/2019	Paid	6/10/2019	Masha Spivak
1560 N. Damen	Roofing Materials	Home Depot	\$709.42	6/5/2019	Paid	6/5/2019	Masha Spivak
1560 N. Damen	Floor Leveling (2nd Floor)	Wayne Lawson	\$1,400.00	6/4/2019	Paid	6/4/2019	Justin Fara
1560 N. Damen	Demo and Framing	Platinum Hands Contracto	\$1,965.00	6/3/2019	Paid	6/26/2019	Masha Spivak
1560 N. Damen	Lumber	Home Depot	\$160.08	5/24/2019	Paid	5/24/2019	Masha Spivak
1560 N. Damen	Lumber	Home Depot	\$134.00	5/20/2019	Paid	5/20/2019	Masha Spivak
1560 N. Damen	Damen Post Remodeling Clean-	Reyes Cleaning	\$350.00	5/18/2019	Paid	5/22/2019	Dion Hickles
1560 N. Damen	Rough Plumbing	A1 Plumbing System Inc	\$3,650.00	5/15/2019	Paid	9/10/2019	Dion Hickles
1560 N. Damen	Lumber	Home Depot	\$97.79	5/13/2019	Paid	5/13/2019	Masha Spivak
1560 N. Damen	Lumber	Home Depot	\$16.26	5/9/2019	Paid	5/9/2019	Masha Spivak
1560 N. Damen	Lumber	Home Depot	\$116.75	5/8/2019	Paid	5/8/2019	Masha Spivak
1560 N. Damen	Lumber	Home Depot	\$222.33	5/6/2019	Paid	5/6/2019	Masha Spivak
1560 N. Damen	Plywood	Home Depot	\$321.04	5/2/2019	Paid	5/2/2019	Michael Langridge
1560 N. Damen	Plywood	Home Depot	\$321.04	4/25/2019	Paid	4/25/2019	Michael Langridge
1560 N. Damen	Plywood	Evanston Lumber	\$478.81	4/25/2019	Paid	4/25/2019	Masha Spivak
1560 N. Damen	Roofing Materials	Home Depot	\$314.53	4/12/2019	Paid	4/12/2019	Masha Spivak
1560 N. Damen	Site Cleaning Materials	CE Construction	\$165.31	3/26/2019	Paid	3/26/2019	Tomer Blackburn
1560 N. Damen	Dumpsters Reimbursement	CE Construction	\$5,625.00	3/26/2019	Paid	3/26/2019	Tomer Blackburn
1560 N. Damen	Rough Plumbing	A1 Plumbing System Inc	\$3,200.00	3/22/2019	Paid	3/25/2019	Tomer Blackburn
1560 N. Damen	Rough Plumbing	A1 Plumbing System Inc	\$6,000.00	2/22/2019	Paid	4/8/2019	Tomer Blackburn
1560 N. Damen	Bolts	Home Depot	\$440.56	2/20/2019	Paid	2/20/2019	Tomer Blackburn
1560 N. Damen	Demo stuff	Home Depot	\$202.29	1/15/2019	Paid	2/7/2019	Kathy Vellios
1560 N. Damen	Framing	CE Construction	\$8,750.00	1/14/2019	Paid	1/14/2019	Tomer Blackburn
1560 N. Damen	Framing Materials	Home Depot	\$269.65	1/9/2019	Paid	1/9/2019	Tomer Blackburn
1560 N. Damen	Fasteners	Home Depot	\$712.82	1/9/2019	Paid	1/9/2019	Tomer Blackburn
1560 N. Damen	Wood	Evanston Lumber	\$1,269.00	1/4/2019	Paid	1/17/2019	Kathy Vellios

1560 N. Damen	Wood	Evanston Lumber	\$1,686.45	12/13/2018	Paid	12/20/2018	Kathy Vellios	
1560 N. Damen	Framing	CE Construction	\$3,500.00	12/6/2018	Paid	12/6/2018	Tomer Blackburn	
1560 N. Damen	Roofing	Ignacio Abad	\$5,900.00	12/1/2018	Paid	3/26/2019	Tomer Blackburn	
1560 N. Damen	Rough HVAC	Universal Refrigeration	\$11,000.00	11/29/2018	Paid	2/1/2019	Tomer Blackburn	
1560 N. Damen	Framing Materials	Evanston Lumber	\$1,868.68	11/21/2018	Paid	11/21/2018	Tomer Blackburn	
1560 N. Damen	Permits	Chicago City Hall	\$150.00	11/20/2018	Paid	11/20/2018	Tomer Blackburn	
1560 N. Damen	Wood	Home Depot	\$471.19	11/19/2018	Paid	12/6/2018	Kathy Vellios	
1560 N. Damen	Framing Materials	Home Depot	\$504.06	11/14/2018	Paid	11/14/2018	Tomer Blackburn	
1560 N. Damen	Wood	Evanston Lumber	\$2,802.05	11/14/2018	Paid	11/15/2018	Kathy Vellios	
1560 N. Damen	Wood	Home Depot	\$807.74	11/13/2018	Paid	12/6/2018	Kathy Vellios	
1560 N. Damen	Demo	CE Construction	\$8,000.00	10/30/2018	Paid	11/2/2018	Tomer Blackburn	
1560 N. Damen	Trash bags	Home Depot	\$35.25	10/16/2018	Paid	10/16/2018	Tomer Blackburn	
1560 N. Damen	Lumber	Home Depot	\$137.20	5/8/2018	Paid	5/8/2018	Tomer Blackburn	
1560 N. Damen	Rough Electrical	Brisko Electric	\$5,000.00	11/29/2018	Void	11/29/2018	Tomer Blackburn	
1560 N. Damen	Demolition	CE Construction	\$9,750.00	10/22/2018	Void	11/29/2018	Tomer Blackburn	

**EXHIBIT B**

**Employee Summary**

Employee Information	Earnings			Taxes			Deductions			Disbursement Type
	Description	YTD Amount	YTD Hours	Description	Withholding/ Overrides	YTD Amount	Description	Per Pay	YTD Amount	
<b>Pay Frequency:</b> Semimonthly										
<b>Blackburn, Tomer</b>	Gross	9,351.76	0.00	FIT	Single/00	1,449.04 Advance			500.00	Check
1400 N Paulina Street	Regular	7,701.76	0.00	SOCSEC		579.81				
Chicago, IL 60622	Bonus	1,650.00	0.00	MEDCARE		135.60				
Home Phone:	Misc	395.00	0.00	IL_SIT	NA/00	462.91				
Mobile:	reimbursement									
Salary Per Pay: 2708.33	non-taxable									
SSN: [REDACTED]										
Hire Date: 6/5/2017										
Birth Date: [REDACTED]										
Status: Active										
Emp Type: Full time										
<b>Fara, Justin</b>	Gross	7,409.66	0.00	FIT	Single/00	1,007.93				Check
2930 N Sheridan Rd	Regular	7,409.66	0.00	SOCSEC		459.40				
#405				MEDCARE		107.44				
Chicago, IL 60657				IL_SIT	NA/00	366.78				
Home Phone:										
Mobile:										
Salary Per Pay: 2500.00										
SSN: [REDACTED]										
Hire Date: 3/1/2018										
Birth Date: [REDACTED]										
Status: Active										
Emp Type: Full time										
<b>Hickles, Dion</b>				FIT	Single/1	0.00				
7741 S Chappel Ave				IL_SIT	NA/1	0.00				
Chicago, IL 60649										
Home Phone:										
Mobile:										
Salary Per Pay: 2083.00										
SSN: [REDACTED]										
Hire Date: 4/8/2019										
Birth Date: [REDACTED]										
Status: Active										
Emp Type: Full time										
<b>Langridge, Michael W</b>	Gross	6,685.65	0.00	FIT	Single/3	532.04				Check
2324 W Winnamac	Regular	6,685.65	0.00	SOCSEC		414.51				
Chicago, IL 60625	Misc	119.69	0.00	MEDCARE		96.94				
Home Phone:				IL_SIT	NA/3	289.03				
Mobile:	reimbursement									
Salary Per Pay: 2229.16	non-taxable									
SSN: [REDACTED]										
Hire Date: 7/1/2015										
Birth Date: [REDACTED]										
Status: Active										
Emp Type: Full time										

Company: BJ Construction Group LLC  
Year: 2019, Quarter: 3

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**Employee Summary**

Employee Information	Earnings			Taxes		Deductions			Disbursement Type
	Description	YTD Amount	YTD Hours	Description	Withholding/ Overrides	YTD Amount	Description	Per Pay	
<b>Pecora, Amber M</b> 2930 N Sheridan Rd Apt 405 Chicago, IL 60657 Home Phone: Mobile: Salary Per Pay: 1100.00 SSN: [REDACTED] Hire Date: 1/1/2018 Birth Date: [REDACTED] Status: Active Emp Type: Full time	Gross Regular	3,299.15 3,299.15	0.00 FIT 0.00 SOCSEC MEDCARE IL SIT	Single/00	314.65 204.55 47.84 163.31				Check
<b>Spivak, Michelle</b> 2913 North Kedzie Avenue Apt 1 Chicago, IL 60618 Home Phone: Mobile: Salary Per Pay: 1729.16 SSN: [REDACTED] Hire Date: 11/12/2018 Birth Date: [REDACTED] Status: Active Emp Type: Full time	Gross Regular Misc	4,140.21 4,140.21 219.90	0.00 FIT 0.00 SOCSEC 0.00 MEDCARE IL SIT	Single/1	352.58 256.69 60.03 190.97				Check
<b>Pay Frequency Totals:</b> Total Employees - Semimonthly: 6 <b>Company Totals:</b>	Semimonthly	Gross Regular Bonus Misc	\$30,886.43 \$29,236.43 \$1,650.00 \$734.59	FIT 0.00 SOCSEC 0.00 MEDCARE 0.00 IL SIT	\$3,656.24 Advance \$1,914.96 \$447.85 \$1,473.00			\$500.00	
Total Active Employees - Company: 6 Total Employees - Company: 6		Gross Regular Bonus Misc	\$30,886.43 \$29,236.43 \$1,650.00 \$734.59	FIT 0.00 SOCSEC 0.00 MEDCARE 0.00 IL SIT	\$3,656.24 Advance \$1,914.96 \$447.85 \$1,473.00			\$500.00	

Company: BJ Construction Group LLC  
Year: 2019, Quarter: 3

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